

BEYS LISTON MOBARGHA & BERLAND LLP
Michael P. Beys

September 16, 2016

VIA ECF & FACSIMILE (212-805-4060)

The Honorable James L. Cott
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *United States v. Kaleil Isaza Tuzman*, No. S1 15 Cr. 536 (PGG)

Dear Judge Cott:

We are counsel to defendant Kaleil Isaza Tuzman, who is currently on home detention, with travel restricted to the Southern District of New York. We respectfully submit this letter to seek permission for Mr. Isaza Tuzman to travel to Western Massachusetts on September 16, 2016 and to spend the weekend with his family and attend a medical appointment there. The government and Pretrial Services have no objection to this request.

Specifically, Mr. Isaza Tuzman requests permission to travel to Massachusetts by car on Friday, September 16, 2016, leaving from the Southern District in the early to mid- afternoon and returning by car on the afternoon of Tuesday, September 20, 2016. He would be traveling between family and close friends, and would stay in the home of a family member and/or at a hotel. He will provide the exact address(es) where he will stay, to be approved by his Pretrial Services Officer.

If this request is approved, Mr. Isaza Tuzman also plans to have a family psychotherapy session with Dr. Stephen Bradley, located at 8 Trumbull Road, Northampton, MA on the morning of Tuesday, September 20, 2016, along with his father, Luis-Orlando Isaza. The defendant's primary court-mandated mental health counselor here in New York strongly supports this joint psychotherapy session.

Additionally, the Court should note that many of Mr. Isaza Tuzman's family members live in Massachusetts, and none of his relatives live here in New York. Under the initial, unmodified bail order – before he made arrangements to reside in Manhattan in order to more effectively meet with his lawyers to prepare his defense – Mr. Isaza Tuzman was supposed “to reside with [his] father in Holyoke MA,” with travel restricted to the District of Massachusetts (ECF 69). As modified, his current bail order specifically contemplates that he will travel periodically to Massachusetts, subject to court approval (ECF 77).

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This is the third request for the defendant to travel to Massachusetts to spend the weekend with family. He received permission to travel there the weekend of August 12, 2016, pursuant to Judge Pitman's endorsement of my letter of August 11, 2016 (ECF 101). He also received permission to travel there over the Labor Day weekend, September 2, 2016, pursuant to Judge Francis's approval (ECF 112); however, plans changed at the last moment and he was not able to leave New York that weekend.

I have spoken with Pretrial Services Officer John Moscato, who is supervising Mr. Isaza Tuzman while on pretrial release, and he has no objection to this request. I have also communicated with Assistant U.S. Attorneys Damian Williams and Andrea Griswold, and the government also has no objection.

We thank the Court in advance for its consideration.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Esq.
Counsel for Kaleil Isaza Tuzman

cc. Hon. Paul G. Gardephe, U.S.D.J. (via ECF)
All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via email)